

**UNITED STATES BANKRUPTCY COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Kevin Michael Keough

CHAPTER 13

Debtor(s)

CASE NO. 18-bk-03251-HWV

MOTION TO TERMINATE WAGE ATTACHMENT

COME NOW, the Debtor, Kevin M. Keough, by and through counsel,
Dawn M. Cutaia, and respectfully represents:

1. The Debtor filed a Chapter 13 Petition on August 2, 2018.
2. Debtor's wages have been attached through his employer, York Area United Fire & Rescue pursuant to a Court order entered on February 28, 2020 (Docket No. 87).
3. Debtor is under median and was only required to be in bankruptcy for 36 months.
4. Debtor extended his bankruptcy pursuant to the CARES Act, but has since obtained a loan modification on his mortgage and his vehicle was totaled in a car accident and paid by GAP insurance. As such, Debtor is able to end his bankruptcy and will be filing a Motion to Modify contemporaneously with the filing of this Motion to Terminate Wage Attachment.

WHEREFORE, the Debtor respectfully requests this Honorable Court enter an Order directing the above-mentioned employer to stop the wage attachment..

Respectfully Submitted,

Date: 6/27/2022

By: /s/ Dawn M. Cutaia

Supreme Court ID 77965
Attorney for Debtor
717-304-1841
1701 W. Market Street
York, PA 17404
dmcutaia@gmail.com

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ORDER TERMINATING WAGE ATTACHMENT.

AND NOW, upon consideration of the above-referenced Motion to Terminate Wage Attachment, said motion is hereby granted the wage attachment under this case number shall terminate. York Area United Fire and Rescue is directed to end the wage attachment as soon as reasonably practicable.

By the Court